



OFFICE OF RECIPIENT RIGHTS  
John T. Sanford, III, Director

Annual Report  
FY 2005/2006

We must scrupulously guard the civil rights and civil liberties of all citizens whatever their background. We must remember that any oppression, any injustice, any hatred, is a wedge designed to attack our civilization.

Franklin D. Roosevelt

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Jennifer M. Granholm, Governor  
Janet Olszewski, Director

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**Mission:** To protect and promote the constitutional and statutory rights of recipients of public mental health services and empower recipients to fully exercise these rights.

**Vision:** All recipients of public mental health services are empowered to exercise their rights and are able to fully participate in all facets of their lives.

# **INTRODUCTION**

## **The Department**

The Michigan Mental Health Code, PA 258 of 1974, established the Michigan Department of Community Health Office of Recipient Rights (DCH-ORR), its functions and its responsibilities. The primary mandates of the office are to provide direct rights protection and advocacy services to individuals admitted to state psychiatric hospitals and centers for developmental disabilities and to assess and monitor the quality and effectiveness of the rights protection systems in community mental health service programs and licensed private psychiatric hospitals/units.

In order to fulfill the statutory mandates, DCH-ORR is organized into three distinct units: the Field Unit, the Training Unit and the Community Rights Unit (see Organizational Chart). This report summarizes the activity in each of these units for FY 2005/2006 and discusses any patterns and trends in rights protection in the state of Michigan identified for this period of time.

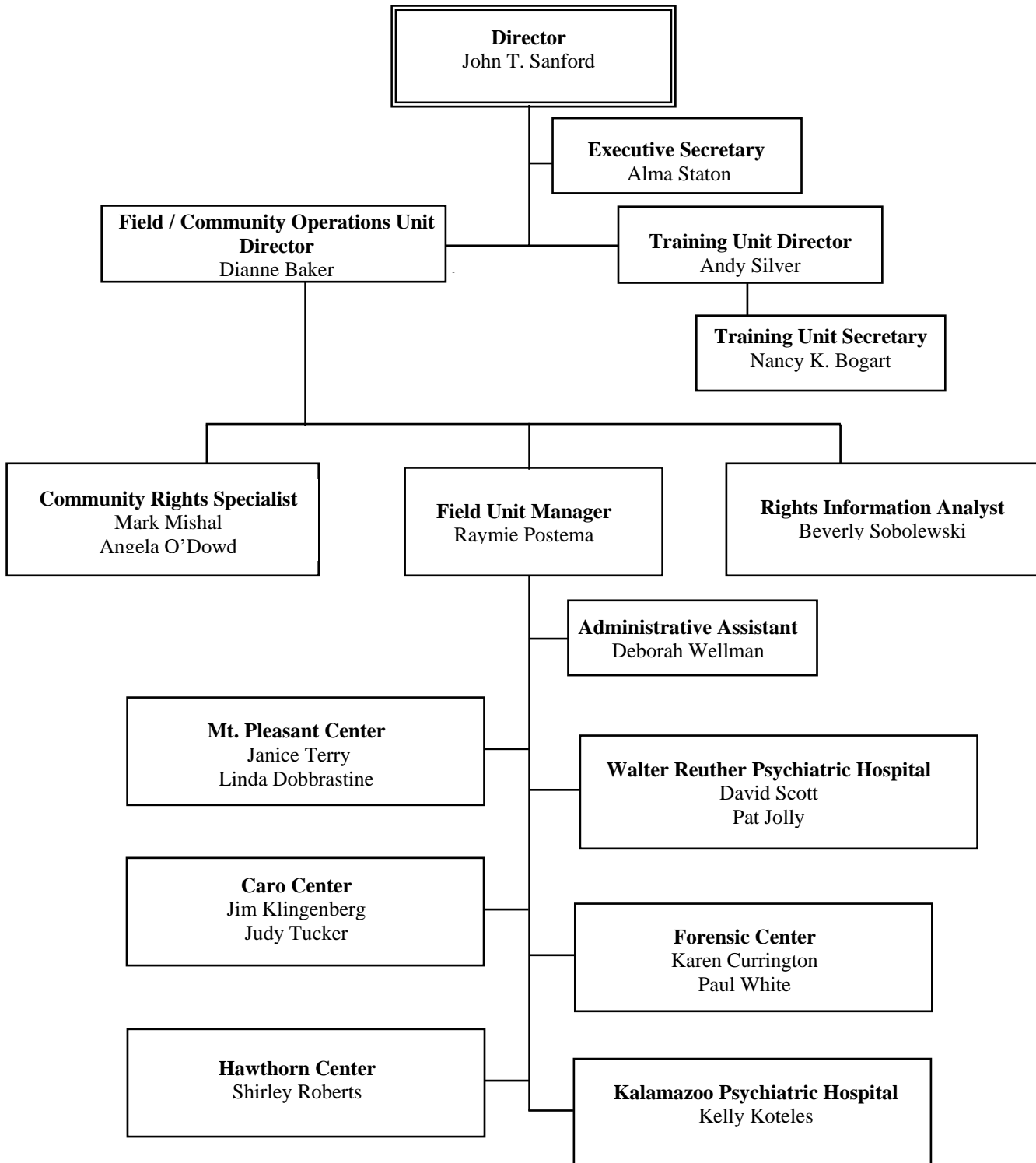
## **The Annual Report**

This Annual Report reflects the requirements outlined in section 330.1754. The state office of recipient rights shall submit to the director of the department and to the committees and subcommittees of the legislature with legislative oversight of mental health matters, for availability to the public, an annual report on the current status of recipient rights for the state. The report shall be submitted not later than March 31 of each year for the preceding fiscal year. The annual report shall include, at a minimum, all of the following:

- (i) Summary data by type or category regarding the rights of recipients receiving services from the department including the number of complaints received by state facility and other state-operated placement agency, the number of reports filed, and the number of reports investigated (page 6)
- (ii) The number of substantiated rights violations in each state facility by category (page 6)
- (iii) The remedial actions taken on substantiated rights violations in each state facility by category (page 10)
- (iv) Training received by staff of the state office of recipient rights (page 21)
- (v) Training provided by the state office of recipient rights to staff of contract providers (page 22)
- (vi) Outcomes of assessments of the recipient rights system of each community mental health services program (page 27)
- (vii) Identification of patterns and trends in rights protection in the public mental health system in this state (page 4)
- (viii) Review of budgetary issues including staffing and financial resources.
- (ix) Summary of the results of any consumer satisfaction surveys conducted (na)
- (x) Recommendations to the department (page 30)

# Michigan Department of Community Health

## OFFICE OF RECIPIENT RIGHTS



## PART I - FIELD UNIT

### Background

During FY 2005/06 ORR had field offices providing rights protection services to each of the six state hospitals and centers: Caro Center, Hawthorn Center, Mt. Pleasant Center, Kalamazoo Psychiatric Hospital, Walter Reuther Psychiatric Hospital, and the Center for Forensic Psychiatry. As of September 30, 2006, the Field Unit consisted of a Unit Manager, one Administrative Assistant, and ten Rights Advisors.

### Complaint Activity

The following terms are used throughout the remainder of this report:

Allegation An assertion of fact made by an individual that has not yet been proved or supported with evidence.

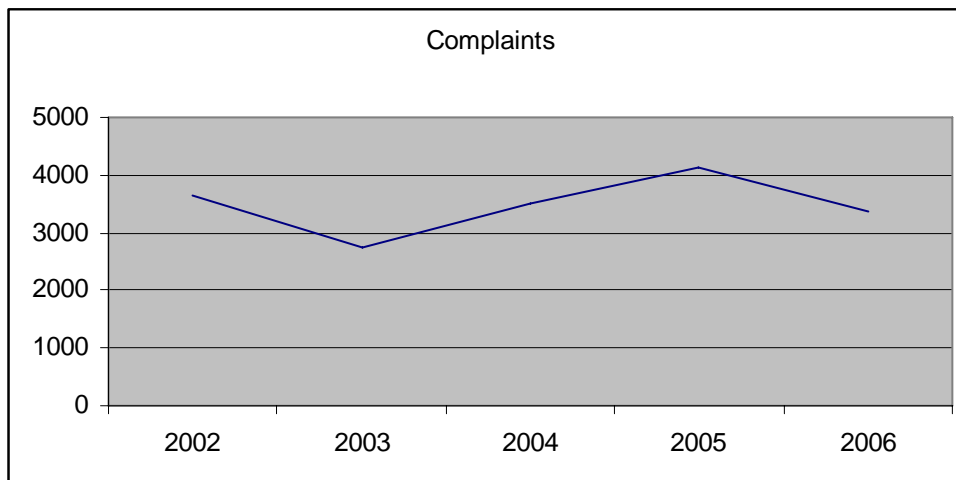
Investigation A detailed inquiry into and a systematic examination of an allegation raised in a rights complaint and reported in accordance with Chapter 7A (must be conducted on allegations of abuse, neglect, serious injury or death when reasonable suspicion exists that a rights violation may have occurred), and may be conducted on other allegations at the discretion of the rights officer/advisor.

Intervention To act on behalf of a recipient to resolve a complaint alleging a violation of a code-protected right when the facts are clear and the remedy, if applicable, is clear, easily obtainable and does not involve statutorily required disciplinary action.

Substantiation A determination that a right was violated, utilizing a preponderance of evidence standard (evidence which is of greater weight or more convincing than the evidence offered in opposition to it) as proof.

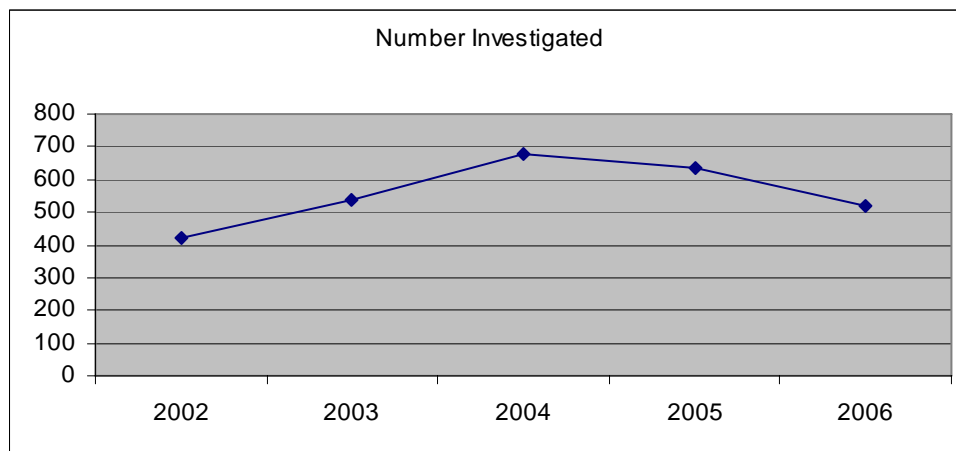
No Right Involved A complaint which has been reviewed but which does not meet criteria for investigation or intervention and does not involve an allegation or violation of a code-protected right.

The following graph depicts a comparison of complaint activity over five fiscal years.

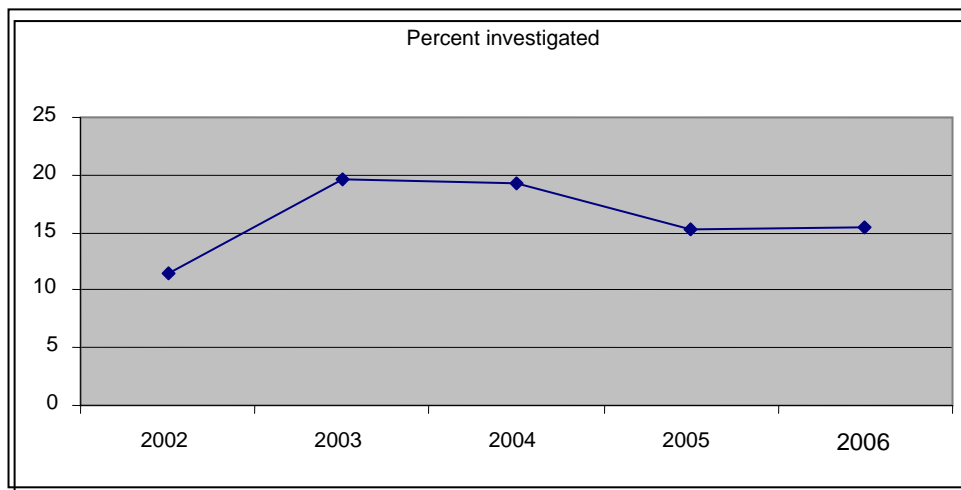


FY	<u>Complaints</u>
2002	3661
2003	2753
2004	3524
2005	4144
2006	3360

The following two graphs depict a comparison of complaint investigation activity over five fiscal years. Please note that there were 407 interventions that were listed as investigations in 2005. The number has been adjusted to reflect the actual investigation figure of 633, which is also reflected in the graph - percent investigated.

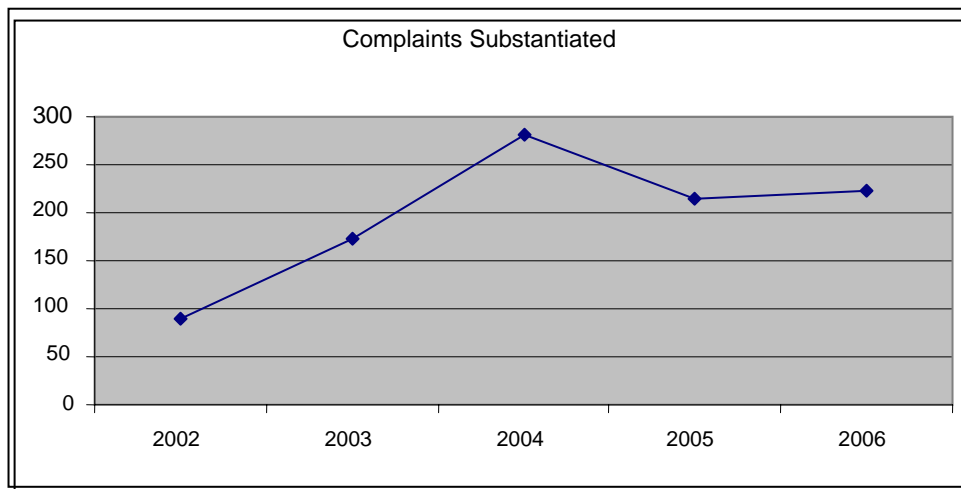


FY	<u>Number Investigated</u>
2002	420
2003	538
2004	677
2005	633
2006	522



FY	<u>Percent investigated</u>
2002	11.47
2003	19.54
2004	19.21
2005	15.27
2006	15.50

The following graph depicts a comparison of complaint substantiation over five fiscal years. However, only the FY 2003 through 2006 data reflects substantiation rates for complaints handled through both intervention and investigation processes. There were 10 additional substantiations noted in 2005, not reflected in the previous annual report.



FY	<u>Complaints Substantiated</u>
2002	89
2003	173
2004	282
2005	214
2006	222

## **Complaint Data**

Complaints reported in state facilities were resolved through intervention in 84.5% of cases, and through investigation in the remaining 15.5% of cases. Data analysis reveals a slight increase in the use of the investigation process from 15.28% in FY 2004/2005. There were 309 complaints made which did not involve a mental health code protected right and 81 complaints made which fell outside the jurisdiction of the hospital/center rights office. Following is the ORR aggregate complaint data for fiscal years FY 2005/2006 for all six state facilities.

### **All State Facilities**

#### **1. Freedom from Abuse**

<b>Code</b>	<b>Category</b>	<b>Received</b>	<b>Investigation</b>	<b>Intervention</b>	<b>Substantiated</b>
7221	Abuse Class I	6	6		2
7222	Abuse Class II	245	245		26
7223	Abuse Class III	113	113		10
7224	Sexual Abuse	27	27		1

#### **2. Freedom from Neglect**

<b>Code</b>	<b>Category</b>	<b>Received</b>	<b>Investigation</b>	<b>Intervention</b>	<b>Substantiated</b>
7225	Neglect Class I	3	3		1
7226	Neglect Class II	19	19		7
7227	Neglect Class III	39	39		25

#### **3. Rights Protection System**

<b>Code</b>	<b>Category</b>	<b>Received</b>	<b>Investigation</b>	<b>Intervention</b>	<b>Substantiated</b>
7760	Access to Rights System	6	0	6	0
7545	Retaliation/Harassment	3	3	0	1
7060	Notice/Explanation of Rights	6	0	6	1
7780	Complaint Investigation Process	2	0	2	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	7	5	2	6

#### **4. Admission/Discharge/Second Opinion**

<b>Code</b>	<b>Category</b>	<b>Received</b>	<b>Investigation</b>	<b>Intervention</b>	<b>Substantiated</b>
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	3	0	3	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	35	0	35	0

## 5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc.	17	1	16	1
7044	Religious Practice	11	0	11	1
7045	Voting	1	0	1	0
7047	Presumption of Competency	1	0	1	0
7048	Marriage/Divorce	0	0	0	0

## 6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	4	0	4	1
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to Provide Information	0	0	0	0

## 7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	14	0	14	3
7262	Contact with Attorneys or others regarding legal matters	1	0	1	0
7263	Access to telephone, mail	69	0	69	4
7264	Funds for postage, stationery, telephone usage	3	0	3	0
7265	Written and posted limitations, if established	5	0	5	0
7266	Uncensored Mail	6	1	5	0
7267	Access to entertainment materials, information, news	33	0	33	2

## 8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	11	1	10	3
7485	Withholding of Information (includes access to records)	17	1	16	0
7486	Correction of Record	7	0	7	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

## 9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	329	3	326	20
7082	Sanitary	49	0	49	5
7083	Humane	259	0	259	7
1708	Dignity & Respect	372	19	353	20
7085	Nutrition	96	0	96	7
7086	Least Restrictive Setting	19	1	18	2



## 10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	193	4	189	9
7400	Restraint	6	0	6	1
7420	Seclusion	4	1	3	1

## 11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	14	0	14	1
7302	Facility Account	31	0	31	1
7303	Easy Access to Money in Account	16	1	15	0
7304	Ability to Spend or Use as Desired	11	0	11	1
7305	Delivery of Money upon Release	6	0	6	0
7360	Labor & Compensation	1	0	1	0

## 12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	95	0	95	8
7282	Storage Space	2	0	2	0
7283	Inspection at Reasonable Times	3	0	3	0
7284	Search/Seizure	7	1	6	3
7285	Exclusions	2	0	2	0
7286	Limitations	5	1	4	0
7287	Receipts to Recipient and to Designated Individual	3	0	3	0
7288	Waiver	0	0	0	0
7289	Protection	113	3	110	14

## 13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	829	15	814	19
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	4	0	4	0
7130	Choice of physician/mental health professional	5	0	5	0
7140	Notice of clinical status/progress	5	0	5	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	8	1	7	2
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	2	1	1	1
7180	Psychotropic Drugs	80	1	79	0
7190	Notice of medication side effects	4	0	4	0
7029	Information on Family Planning	0	0	0	0

#### 14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	5	1	4	1
7122	Timely development	0	0	0	0
7123	Requests for Review	2	0	2	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	6	0	6	0

#### 15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	6	1	5	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

#### 16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	46	0	46	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	2	0	2	0
Total Investigated/Intervened		3353	518	2835	222

#### 17. No Right Involved

Code	Category	Received
0000	No Right Involved	309

#### 18. Outside Provider Jurisdiction

Code	Category	Received
0001	Outside Provider Jurisdiction	80

## Remedial Action

The Mental Health Code requires in 330.1780 (1): “If it has been determined through investigation that a right has been violated, the respondent shall take appropriate remedial action that meets all of the following requirements: (a) Corrects or provides a remedy for the rights violations. (b) Is implemented in a timely manner. (c) Attempts to prevent a recurrence of the rights violation.” It is the responsibility of the ORR to maintain a record of the documented action.

Remedial Action Key					
01	Verbal Counseling	06	Staff Transfer	10	Policy Revision/Development
02	Written Counseling	07	Training	11	Environmental Repair /Enhancement
03	Written Reprimand	08	Employment Termination	12	Plan of Service Revision
04	Suspension	08*	Employee left the agency, but substantiated	13	Recipient Transfer to Another Provider/Site
05	Demotion	09	Contract Action	14	Other

The following summarizes remedial action on substantiated complaints by category in state hospitals and facilities. The table below indicates the category of complaint, the facility where the violation occurred and the specific remedial action taken.

The Mental Health Code requires in 330.1722 (2) “the department...shall ensure that appropriate disciplinary action is taken against those who have engaged in abuse or neglect”. (*emphasis added*) Additionally, Administrative Rule 330.7035 requires that abuse or neglect of a recipient by an employee, volunteer or agent of a provider shall, upon substantiated reports, “subject the employee, volunteer or agent of the provider to an appropriate penalty, including official reprimand (01, 02, 03), demotion (05), suspension (04), reassignment (06), or dismissal (08 or \*08).” (*parentheticals added*) Remedial action that does not meet the requirements of the Code and Rules are 7, 10, 11, and 14. State Facility Directors failed to take any action in three substantiated cases, and failed to ensure appropriate disciplinary action in no cases of abuse or neglect, where the accused is identified.

State Hospital/Center Remediation of Substantiated Rights Violations (includes complaints investigated and those addressed through other interventions)				
Cat.	Specific Allegation	Specific Provider	Specific Remedial Action	Type
7221	Abuse Class I	Kalamazoo Psychiatric Hospital	Termination	08
7221	Abuse Class I	Mt. Pleasant Center	Termination	08
7224	Sexual Abuse	Caro Center	Employee left; substantiated	08*
7222	Abuse Class II	Center for Forensic Psychiatry	Written Reprimand	03
7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Written Reprimand	03
7222	Abuse Class II	Mt. Pleasant Center	Written Reprimand	03
7222	Abuse Class II	Center for Forensic Psychiatry	Suspension	04
7222	Abuse Class II	Hawthorn Center	Suspension	04
7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Suspension	04
7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Suspension	04
7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Suspension	04
7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Suspension	04
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7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Suspension	04
7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Suspension	04
7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Suspension	04
7222	Abuse Class II	Mt. Pleasant Center	Suspension	04
7222	Abuse Class II	Mt. Pleasant Center	Suspension	04
7222	Abuse Class II	Mt. Pleasant Center	Suspension	04
7222	Abuse Class II	Mt. Pleasant Center	Suspension	04
7222	Abuse Class II	Walter Reuther Hospital	Suspension	04

<b>Cat.</b>	<b>Specific Allegation</b>	<b>Specific Provider</b>	<b>Specific Remedial Action</b>	<b>Type</b>
7222	Abuse Class II	Walter Reuther Hospital	Suspension	04
7222	Abuse Class II	Walter Reuther Hospital	Suspension	04
7222	Abuse Class II	Kalamazoo Psychiatric Hospital	Staff Transfer	06
7222	Abuse Class II	Hawthorn Center	Termination	08
7222	Abuse Class II	Mt. Pleasant Center	Termination	08
7222	Abuse Class II	Mt. Pleasant Center	Termination	08
7222	Abuse Class II	Mt. Pleasant Center	Suspension	04
7222	Abuse Class II	Mt. Pleasant Center	Suspension	04
7223	Abuse Class III	Kalamazoo Psychiatric Hospital	Written Reprimand	03
7223	Abuse Class III	Kalamazoo Psychiatric Hospital	Written Reprimand	03
7223	Abuse Class III	Kalamazoo Psychiatric Hospital	Written Reprimand	03
7223	Abuse Class III	Mt. Pleasant Center	Written Reprimand	03
7223	Abuse Class III	Mt. Pleasant Center	Written Reprimand	03
7223	Abuse Class III	Kalamazoo Psychiatric Hospital	Suspension	04
7223	Abuse Class III	Kalamazoo Psychiatric Hospital	Suspension	04
7223	Abuse Class III	Mt. Pleasant Center	Suspension	04
7223	Abuse Class III	Center for Forensic Psychiatry	Employee left; substantiated	08*
7223	Abuse Class III	Mt. Pleasant Center	Written Reprimand	03
7225	Neglect Class I	Kalamazoo Psychiatric Hospital	Other	14
7226	Neglect Class II	Mt. Pleasant Center	Verbal Counseling	01
7226	Neglect Class II	Caro Center	Suspension	04
7226	Neglect Class II	Hawthorn Center	Suspension	04
7226	Neglect Class II	Walter Reuther Hospital	Suspension	04
7226	Neglect Class II	Mt. Pleasant Center	Termination	08
7226	Neglect Class II	Mt. Pleasant Center	Written Reprimand	03
7226	Neglect Class II	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Training	07
7227	Neglect Class III	Caro Center	Written Counseling	02
7227	Neglect Class III	Hawthorn Center	Written Counseling	02
7227	Neglect Class III	Kalamazoo Psychiatric Hospital	Written Counseling	02
7227	Neglect Class III	Hawthorn Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Mt. Pleasant Center	Written Reprimand	03
7227	Neglect Class III	Walter Reuther Hospital	Written Reprimand	03
7227	Neglect Class III	Walter Reuther Hospital	Written Reprimand	03
7227	Neglect Class III	Center for Forensic Psychiatry	Suspension	04
7227	Neglect Class III	Hawthorn Center	Suspension	04
7227	Neglect Class III	Kalamazoo Psychiatric Hospital	Suspension	04
7227	Neglect Class III	Walter Reuther Hospital	Suspension	04
7227	Neglect Class III	Mt. Pleasant Center	Training	07
7227	Neglect Class III	Mt. Pleasant Center	Termination	08
7227	Neglect Class III	Center for Forensic Psychiatry	Employee left; substantiated	08*
7227	Neglect Class III	Mt. Pleasant Center	Other	14
7227	Neglect Class III	Mt. Pleasant Center	(no employee identified)	
7545	Retaliation/Harassment	Mt. Pleasant Center	Suspension	04
7060	Notice/Explanation of Rights	Caro Center	Verbal Counseling	01

<b>Cat.</b>	<b>Specific Allegation</b>	<b>Specific Provider</b>	<b>Specific Remedial Action</b>	<b>Type</b>
7520	Failure to Report	Mt. Pleasant Center	Written Reprimand	03
7520	Failure to Report	Mt. Pleasant Center	Written Reprimand	03
7520	Failure to Report	Mt. Pleasant Center	Training	07
7520	Failure to Report	Mt. Pleasant Center	Training	07
7041	Civil Rights: Discrimination, Accessibility, etc.	Center for Forensic Psychiatry	Written Reprimand	03
7044	Religious Practice	Kalamazoo Psychiatric Hospital	Policy Revision	10
7111	Family Dignity and Respect	Walter Reuther Hospital	Policy Revision	10
7261	Visitation	Mt. Pleasant Center	Written Counseling	02
7261	Visitation	Walter Reuther Hospital	Policy Revision	10
7261	Visitation	Walter Reuther Hospital	Other	14
7263	Access to telephone, mail	Caro Center	Environmental Enhancement	11
7263	Access to telephone, mail	Center for Forensic Psychiatry	Environmental Enhancement	11
7263	Access to telephone, mail	Caro Center	Plan of Service Revision	12
7263	Access to telephone, mail	Caro Center	Plan of Service Revision	12
7267	Access to entertainment materials, information, news	Caro Center	Environmental Enhancement	11
7267	Access to entertainment materials, information, news	Walter Reuther Hospital	Other	14
7481	Disclosure of Confidential Information	Kalamazoo Psychiatric Hospital	Verbal Counseling	01
7481	Disclosure of Confidential Information	Kalamazoo Psychiatric Hospital	Verbal Counseling	01
7481	Disclosure of Confidential Information	Mt. Pleasant Center	Training	07
7081	Safe Environment	Walter Reuther Hospital	Written Counseling	02
7081	Safe Environment	Caro Center	Training	07
7081	Safe Environment	Center for Forensic Psychiatry	Training	07
7081	Safe Environment	Caro Center	Environmental Enhancement	11
7081	Safe Environment	Caro Center	Environmental Enhancement	11
7081	Safe Environment	Kalamazoo Psychiatric Hospital	Environmental Enhancement	11
7081	Safe Environment	Walter Reuther Hospital	Plan of Service Revision	12
7081	Safe Environment	Walter Reuther Hospital	Plan of Service Revision	12
7081	Safe Environment	Walter Reuther Hospital	Plan of Service Revision	12
7081	Safe Environment	Walter Reuther Hospital	Plan of Service Revision	12
7081	Safe Environment	Caro Center	Recipient Transfer to Another Site	13
7081	Safe Environment	Center for Forensic Psychiatry	Other	14
7081	Safe Environment	Center for Forensic Psychiatry	Other	14
7081	Safe Environment	Center for Forensic Psychiatry	Other	14
7081	Safe Environment	Walter Reuther Hospital	Other	14
7081	Safe Environment	Walter Reuther Hospital	Other	14
7081	Safe Environment	Walter Reuther Hospital	Other	14
7081	Safe Environment	Walter Reuther Hospital	Other	14
7081	Safe Environment	Walter Reuther Hospital	Other	14
7081	Safe Environment	Walter Reuther Hospital	Other	14
7081	Safe Environment	Caro Center	Written Reprimand	03
7082	Sanitary Environment	Caro Center	Training	07
7082	Sanitary Environment	Caro Center	Contract Action	09
7082	Sanitary Environment	Caro Center	Environmental Enhancement	11
7082	Sanitary Environment	Caro Center	Environmental Enhancement	11
7082	Sanitary Environment	Walter Reuther Hospital	Other	14
7083	Humane Environment	Caro Center	Environmental Enhancement	11
7083	Humane Environment	Caro Center	Environmental Enhancement	11
7083	Humane Environment	Caro Center	Environmental Enhancement	11
7083	Humane Environment	Center for Forensic Psychiatry	Environmental Enhancement	11
7083	Humane Environment	Center for Forensic Psychiatry	Environmental Enhancement	11

<b>Cat.</b>	<b>Specific Allegation</b>	<b>Specific Provider</b>	<b>Specific Remedial Action</b>	<b>Type</b>
7083	Humane Environment	Caro Center	Other	14
7083	Humane Environment	Center for Forensic Psychiatry	Other	14
1708	Dignity & Respect	Kalamazoo Psychiatric Hospital	Verbal Counseling	01
1708	Dignity & Respect	Kalamazoo Psychiatric Hospital	Verbal Counseling	01
1708	Dignity & Respect	Caro Center	Written Counseling	02
1708	Dignity & Respect	Center for Forensic Psychiatry	Written Counseling	02
1708	Dignity & Respect	Mt. Pleasant Center	Written Counseling	02
1708	Dignity & Respect	Center for Forensic Psychiatry	Written Reprimand	03
1708	Dignity & Respect	Hawthorn Center	Written Reprimand	03
1708	Dignity & Respect	Kalamazoo Psychiatric Hospital	Written Reprimand	03
1708	Dignity & Respect	Mt. Pleasant Center	Written Reprimand	03
1708	Dignity & Respect	Walter Reuther Hospital	Written Reprimand	03
1708	Dignity & Respect	Walter Reuther Hospital	Written Reprimand	03
1708	Dignity & Respect	Caro Center	Training	07
1708	Dignity & Respect	Caro Center	Training	07
1708	Dignity & Respect	Center for Forensic Psychiatry	Training	07
1708	Dignity & Respect	Center for Forensic Psychiatry	Training	07
1708	Dignity & Respect	Mt. Pleasant Center	Training	07
1708	Dignity & Respect	Mt. Pleasant Center	Training	07
1708	Dignity & Respect	Mt. Pleasant Center	Training	07
1708	Dignity & Respect	Walter Reuther Hospital	Training	07
1708	Dignity & Respect	Center for Forensic Psychiatry	Other	14
7085	Nutrition	Caro Center	Training	07
7085	Nutrition	Caro Center	Training	07
7085	Nutrition	Caro Center	Training	07
7085	Nutrition	Mt. Pleasant Center	Training	07
7085	Nutrition	Mt. Pleasant Center	Policy Revision	10
7085	Nutrition	Center for Forensic Psychiatry	Environmental Enhancement	11
7085	Nutrition	Center for Forensic Psychiatry	Other	14
7086	Least Restrictive Setting	Kalamazoo Psychiatric Hospital	Verbal Counseling	01
7086	Least Restrictive Setting	Caro Center	Written Counseling	02
7441	Restrictions/Limitations	Caro Center	Verbal Counseling	01
7441	Restrictions/Limitations	Center for Forensic Psychiatry	Written Reprimand	03
7441	Restrictions/Limitations	Caro Center	Training	07
7441	Restrictions/Limitations	Caro Center	Training	07
7441	Restrictions/Limitations	Caro Center	Policy Revision	10
7441	Restrictions/Limitations	Kalamazoo Psychiatric Hospital	Plan of Service Revision	12
7441	Restrictions/Limitations	Center for Forensic Psychiatry	Other	14
7441	Restrictions/Limitations	Walter Reuther Hospital	Other	14
7441	Restrictions/Limitations	Caro Center		
7400	Restraint	Kalamazoo Psychiatric Hospital	Training	07
7420	Seclusion	Kalamazoo Psychiatric Hospital	Training	07
7301	Safeguarding Money	Center for Forensic Psychiatry	Other	14
7302	Facility Account	Walter Reuther Hospital	Other	14
7304	Ability to use by choice	Caro Center	Verbal Counseling	01
7281	Possession/Use	Caro Center	Training	07
7281	Possession/Use	Caro Center	Training	07
7281	Possession/Use	Kalamazoo Psychiatric Hospital	Policy Revision	10
7281	Possession/Use	Caro Center	Environmental Enhancement	11
7281	Possession/Use	Center for Forensic Psychiatry	Other	14
7281	Possession/Use	Walter Reuther Hospital	Other	14
7281	Possession/Use	Walter Reuther Hospital	Other	14
7281	Possession/Use	Walter Reuther Hospital	Other	14
7284	Search/Seizure	Kalamazoo Psychiatric Hospital	Verbal Counseling	01
7284	Search/Seizure	Mt. Pleasant Center	Written Reprimand	03

<b>Cat.</b>	<b>Specific Allegation</b>	<b>Specific Provider</b>	<b>Specific Remedial Action</b>	<b>Type</b>
7284	Search/Seizure	Kalamazoo Psychiatric Hospital	Training	07
7289	Protection	Caro Center	Environmental Enhancement	11
7289	Protection	Caro Center	Environmental Enhancement	11
7289	Protection	Walter Reuther Hospital	Plan of Service Revision	12
7289	Protection	Kalamazoo Psychiatric Hospital	Other	14
7289	Protection	Kalamazoo Psychiatric Hospital	Other	14
7289	Protection	Kalamazoo Psychiatric Hospital	Other	14
7289	Protection	Kalamazoo Psychiatric Hospital	Other	14
7289	Protection	Walter Reuther Psychiatric Hospital	Other	14
7289	Protection	Walter Reuther Hospital	Other	14
7289	Protection	Walter Reuther Hospital	Other	14
7289	Protection	Walter Reuther Hospital	Other	14
7289	Protection	Kalamazoo Psychiatric Hospital	Verbal Counseling	01
7289	Protection	Kalamazoo Psychiatric Hospital	Demotion	05
7289	Protection	Caro Center	Policy Revision	10
7080	Services suited to Condition	Mt. Pleasant Center	Verbal Counseling	01
7080	Services suited to Condition	Caro Center	Written Counseling	02
7080	Services suited to Condition	Mt. Pleasant Center	Written Counseling	02
7080	Services suited to Condition	Walter Reuther Hospital	Written Reprimand	03
7080	Services suited to Condition	Caro Center	Training	07
7080	Services suited to Condition	Caro Center	Training	07
7080	Services suited to Condition	Center for Forensic Psychiatry	Training	07
7080	Services suited to Condition	Mt. Pleasant Center	Training	07
7080	Services suited to Condition	Mt. Pleasant Center	Training	07
7080	Services suited to Condition	Center for Forensic Psychiatry	Policy Revision	10
7080	Services suited to Condition	Center for Forensic Psychiatry	Environmental Enhancement	11
7080	Services suited to Condition	Center for Forensic Psychiatry	Plan of Service Revision	12
7080	Services suited to Condition	Walter Reuther Hospital	Plan of Service Revision	12
7080	Services suited to Condition	Walter Reuther Hospital	Plan of Service Revision	12
7080	Services suited to Condition	Center for Forensic Psychiatry	Other	14
7080	Services suited to Condition	Center for Forensic Psychiatry	Other	14
7080	Services suited to Condition	Center for Forensic Psychiatry	Other	14
7080	Services suited to Condition	Center for Forensic Psychiatry	Other	14
7080	Services suited to Condition	Walter Reuther Hospital	Other	14
7003	Informed Consent	Caro Center	Policy Revision	10
7160	Surgery	Mt. Pleasant Center	Written Reprimand	03
7121	Person-centered Process	Caro Center		

## **DCH-ORR Field Unit Goals and Objectives for FY 2006 - 2007**

**GOAL I:**     To assure a uniformly high standard in the protection of the rights of recipients.

Objective A: To complete 80% of Reports of Investigative Findings (RIFs) within 75 days of receipt of complaints.

1.     All staff will be sent weekly open case reports to identify timelines and due dates.
2.     A monthly report will be sent to the unit supervisor to monitor RIF timelines and progress towards the objective.

**GOAL II:**     To empower recipients to fully exercise their rights.

Objective A: To identify areas for improvement in person-centered planning (PCP) at DCH operated hospitals and centers.

1. Continue participation by field unit staff in the PCP Workgroup charged with creating a uniform policy for using PCP in the development of the Individual Plan of Service for those persons receiving services at a DCH operated hospital or center. This workgroup has also been charged with creating a uniform PCP training curriculum.
2. Each Rights Advisor will follow a minimum of one individual through the treatment planning process, including annual meetings, updates, special staffings, etc., at their prospective hospital or center from 4/01/07 until 9/30/07 or until discharge. All documentation related to planning for the individual will be kept by the Rights Advisor.
3. The field unit will meet quarterly to discuss staff and consumer training opportunities identified and process changes that may be needed.



# DCH RECIPIENT RIGHTS APPEALS COMMITTEE

## Background

The Michigan Mental Health Code at Section 774 states, “The director shall appoint an appeals committee consisting of 7 individuals, none of whom shall be employed by the department or a community mental health services program, to hear appeals of recipient rights matters. The committee shall include at least 3 members of the state recipient rights advisory committee and 2 primary consumers.”

The DCH Appeals Committee reviews appeals of rights complaints filed by or on behalf of patients/residents of state hospitals/centers. Additionally, it reviews appeals submitted by or on behalf of individuals who are or have been patients in one of the 46 licensed private psychiatric hospitals/units (LPH/U) who have entered into an agreement to use the department’s appeals committee in lieu of appointing its own.

Following is a data summary of activity for the DCH Appeals Committee for FY 2004/2005:

Total By Number of Cases Reviewed	<b>29</b>
<u>Appeals Committee five day Review Decisions</u>	
Cases received that were not heard	<b>13</b>
Appeals filed > 45 day time frame	1
Cases stating no ground for appeal	11
Cases misfiled/referred back to local CMHSP/LPH	1
<u>Appeals heard from State Hospitals/Centers</u>	<b>6</b>
Caro Center	4
Hawthorn Center	0
Walter Reuther	0
Mt. Pleasant Center	1
Kalamazoo Psychiatric Hospital	0
Forensic Center	1
<u>Appeals heard from LPH/Us</u>	<b>10</b>
Chelsea Hospital	8
Crittenton	1
Pathways	1
<u>Appeals Committee Decision on Appeals Heard</u>	
Upheld findings of rights office and action taken	13
Returned to ORR for re-investigation	2
Returned to facility for different or additional action	1
Referred for external investigation	0

## **PART II – TRAINING UNIT**

### **Overview**

The ORR Training Unit develops and presents instructional programs with the goal of providing consistent implementation of recipient rights protection processes across the state.

In order to carry out this mission, the Unit provides training to rights staff from DCH facility rights offices, licensed private hospital/units (LPH/U), community mental health service providers (CMHSP) and their contract agencies. These classes focus on providing the skills necessary to assure that the rights of recipients in their jurisdiction will be fully protected. In addition, the Unit offers educational programs for persons, other than rights staff, who are involved in the recipient rights arena (Recipient Rights Advisory Committee and Recipient Rights Appeals Committee members, staff from other state and advocacy agencies, staff of service providers) and those whose roles, although ancillary in nature, are essential to preserving and promoting the rights of recipients.

The Training Unit also has the responsibility for planning, coordinating and implementing the recipient rights conference. This annual event brings together staff and recipients from across the state to discuss current issues related to recipient rights and provides an opportunity for rights staff to fulfill their statutorily mandated annual training requirements in a forum which will enhance their job performance.

### **Educational Offerings by the Training Unit**

The Michigan Mental Health Code at Section 774 states, “Technical assistance and training in recipient rights protection are available to all community mental health services programs and other mental health service providers subject to this act.” Several training opportunities were offered in FY 2005/2006. “*Basic Skills*,” a three-part, 36 hour program, provides training and skill development required to carry out the rights officer’s/advisor’s responsibilities mandated in Chapters 7 and 7A of the Mental Health Code.

The three-day long Part 1 focuses on the role of the rights office, its interaction with other segments of the agency and consumers, and the requirements of the job. Part 2, subtitled the “*Art of Investigation*,” concentrates on the skills necessary to do a thorough and effective investigation. The last segment of the curriculum, “*Developing Effective Rights Training*,” is a two-day session designed to develop the rights officer’s/advisor’s skills necessary to train agency and provider staff on recipient rights issues. It includes both the principals of training and a review of required training content.

*Developing Issues Training* is a comprehensive review of the requirements for effective report writing. It provides attendees a chance to reexamine and reapply the major components of the report format.

*Recipient Rights Advisory Committee* training provides the information necessary for committee members to function effectively and carry out their mandated roles as advocates for the ORR office and staff.

*Appeals Committee* training takes participants through the appeals process and provides the tools necessary to conduct a fair and impartial appellate review. The following is a summary of the sessions, and program attendance, offered during FY 2005/2006.

<b><u>Title of Course</u></b>	<b>Date Conducted</b>	<b>Attendees</b>
Basic Skills Training	November 2005	18
Basic Skills Training	February 2006	10
Basic Skills Training	April 2006	9
Basic Skills Training	June 2006	13
Basic Skills Training	September 2006	23
Total		73
Art of Investigation	November 2005	10
Art of Investigation	February 2006	11
Art of Investigation	April 2006	12
Art of Investigation	June 2006	7
Art of Investigation	September 2006	17
Total		57
Developing Effective Rights Training	December 2005	13
Developing Effective Rights Training	January 2006	11
Developing Effective Rights Training	March 2006	9
Developing Effective Rights Training	May 2006	7
Developing Effective Rights Training	July 2006	13
Total		53
OTHER TRAININGS		
RRAC/Appeals Committee Training	April 2006	11
RRAC Training	April 2006	4
RRAC Training	May 2006	5
Total		20
Grand Total		194

## **Evaluations**

Following each training session, the Training Unit received evaluations of the training presented. Following are compilations of the evaluation data for FY 2005-2006. The evaluation is based on a scale of 1 to 5, with 5 being “excellent,” and 1 being “poor.”

### **Basic Skills Training Part I**

#### **Putting the Pieces Together**

	<b>Rating</b>
The information presented	4.75
The organization of the material	4.48
The audio-visual materials and handouts	4.58
The trainer(s)’ knowledge of the subject matter	4.84
Responses to questions asked	4.80
Presentation as a whole	4.65

### **Basic Skills Training Part II**

#### **The Art of Investigation**

	<b>Rating</b>
The information presented	4.86
The organization of the material	4.82
The audio-visual materials and handouts	4.84
The trainer(s)’ knowledge of the subject matter	4.96
Responses to questions asked	4.91
Presentation as a whole	4.87

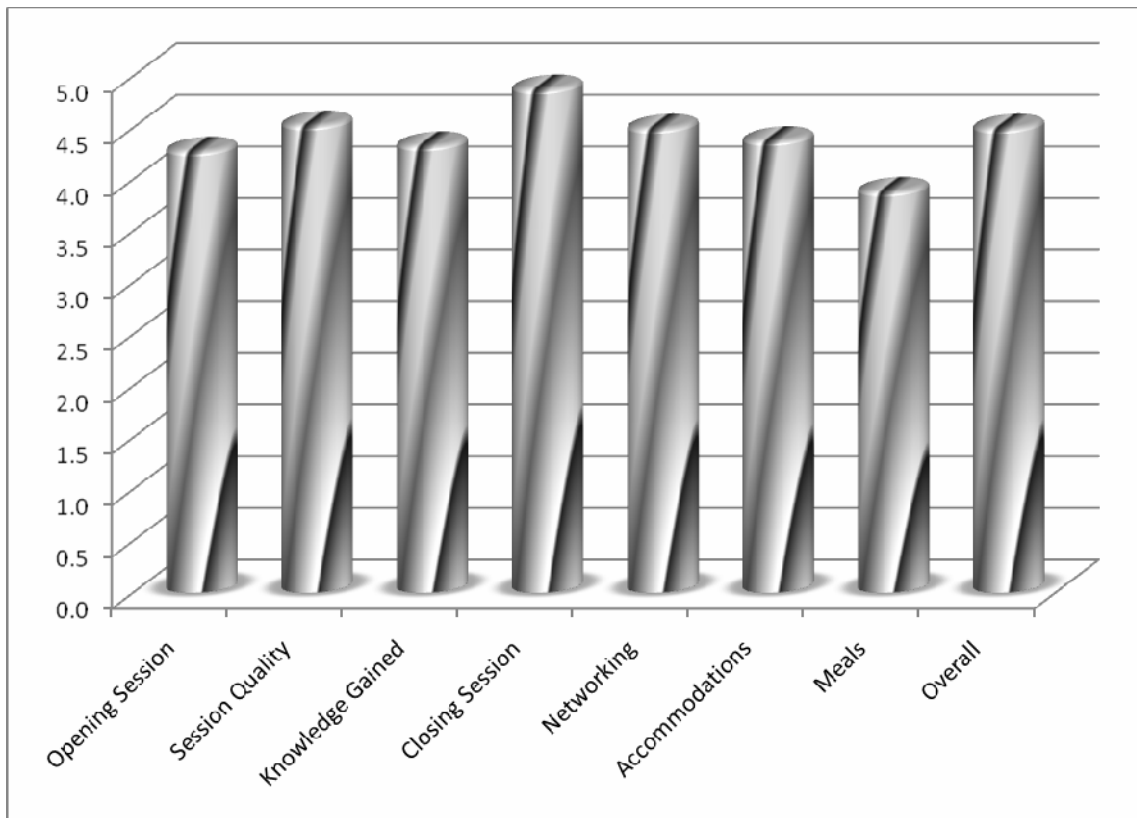
### **Basic Skills Training Part III**

#### **Developing Effective Rights Training**

	<b>Rating</b>
The information presented	4.65
The organization of the material	4.71
The audio-visual materials and handouts	4.60
The trainer(s)’ knowledge of the subject matter	4.87
Responses to questions asked	4.76
Presentation as a whole	4.65

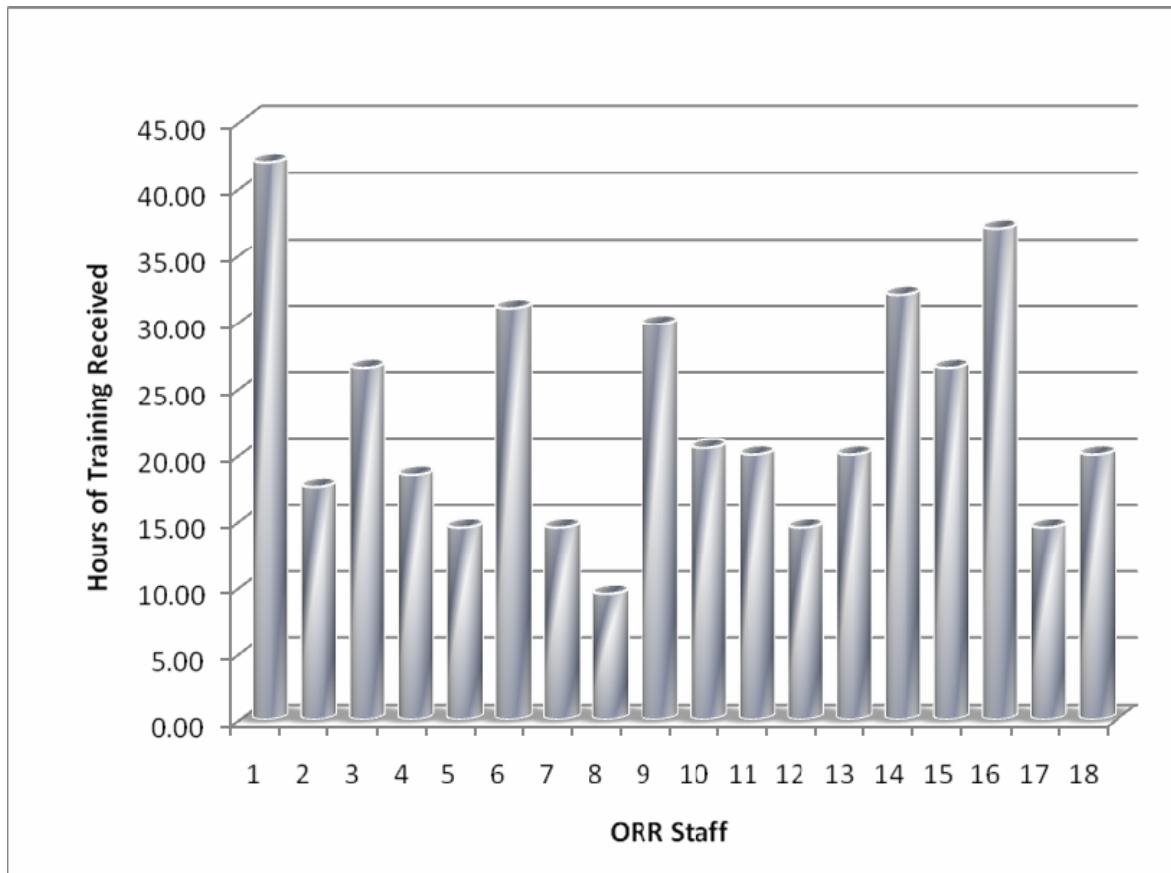
## **2005 Recipient Rights Conference: Rights Through Time**

The 12<sup>th</sup> Annual Recipient Rights Conference was held October 18 – 21, 2005, at the Crowne Plaza Hotel, in Romulus, Michigan. Approximately 343 individuals attended. The Rights Conference is self-funded, using no Department financial resources for its support. Through the conference scholarship program, mental health consumers from across the state are provided the opportunity to attend the sessions; the conference covers the cost of registration while hotel accommodations and travel expenses are provided by the sponsoring CMHSP. In 2005, 36 consumers attended the conference under this sponsorship. Twenty-six wide-ranging sessions were presented during the conference with topics as varied as Investigating Sexual Assault and Domestic Violence Allegations, Diversity, and Linguistic Interviewing and Statement Analysis. Speakers included nationally-known presenters such as Dr. Dale Henry and Ryan Spellecy. Several roundtable discussions were held in the areas of consumer, community, and hospital rights. In addition several well-known advocates and professionals associated with the recipient rights community addressed the attendees. A first for the conference was an art contest. Recipients from across the state were asked to submit photos of the art or craftwork, 13 of which were chosen to be depicted on a calendar produced by the conference in conjunction with the Rights Officer's Association of Michigan. Responses to the conference evaluation indicated an overall satisfaction level of 4.49 on a scale of 1 to 5. These responses, and the areas they evaluated, are depicted in the graph below:



## **Training Received by Staff of the State Office of Recipient Rights**

The Office of Recipient Rights staff are required to receive education in rights protection on an annual basis. Training opportunities for Department staff include, but are not limited to, the fall Recipient Rights Conference, quarterly offerings by the Recipient Rights Officers Association of Michigan, and the three-part, 36 hour recipient rights officers program, which includes Basic Skills, Art of Investigation, and Developing Effective Rights Training. The following chart indicates the number of hours of training Department ORR staff received during FY 05/2006. Staff listed in the chart reflect ORR administrative staff, field staff, training staff specialists, as well as support staff.



### **Rights Training Provided by ORR Field Unit Staff at DCH Facilities**

The Mental Health Code requires that all DCH staff receive training related to recipient rights protection within 30 days of hire. At each of the state psychiatric hospitals, centers for persons with developmental disabilities, and the Center for Psychiatry, the rights staff assigned to the facility are carrying out this mandate, using curricula developed by the Training Unit. This training is a priority for rights staff, and is so essential that it has been established as an objective in the management plans of each field office. The following summarizes the trainings provided at each facility by the Rights Officer.

<b>Hospital/Center</b>	<b>Attendees</b>
Caro Center	58
Center for Forensic Psychiatry	46
Hawthorn Center	107
Kalamazoo Psychiatric Hospital	60
Mt. Pleasant Center	477
Walter Reuther Psychiatric Hospital	130
MDCH-Central Office	0
<b>Total</b>	<b>878</b>

### **Rights Training Provided by ORR Field Unit Staff to Consumers**

The Office of Recipient Rights supports education of consumers in addition to staff. ORR staff at DCH operated hospitals and centers carried out a variety of informational sessions when they, or consumers, identified issues of concern. A summary of these trainings is provided in the chart below:

<b>Hospital/Center</b>	<b>Attendees</b>
Caro Center	66
Center for Forensic Psychiatry	278
Hawthorn Center	361
Kalamazoo Psychiatric Hospital	6
Mt. Pleasant Center	61
Walter Reuther Psychiatric Hospital	1474
<b>Total</b>	<b>2246</b>

## **Training and Technical Assistance by the Community Rights Unit**

Throughout the past fiscal year, the Community Rights Unit has provided technical assistance and consultation to rights officers/advisors in community-based mental health services in a timely and quality manner.

Following is a detailed summary of training provided by the Community Rights Unit upon request of rights officers/advisors and Recipient Rights Advisory and Appeals Committees:

Date	Agency	Topic	CRU Staff Person
12/08/05	Macomb CMH	Issue Development	Baker/Postema
12/15/05	CMH of Central MI	Issue Development	Baker/Mishal
2/09/06	DCH Appeals Cmtee	Advanced Appeals	Mishal
2/14/06	Detroit-Wayne CMH	Issue Development	Baker/Mishal
2/16/06	Oakland CMH	Advanced Appeals	Mishal
2/21/06	Kalamazoo CMH	Advanced Appeals	Mishal
3/10/06	Genesee	Issues Development	Mishal
3/13/06	Huron CMH	Advanced Appeals	Mishal
3/14/06	Bay-Arenac CMH	Advanced Appeals	Mishla
3/24/06	DCH Child/Family Conference	Rights of Children and Families	Baker
5/9/06	Pathways	Issues Development	Mishal
5/9/06	Pathways	Rights Advisory Committee Training (RRAC)	Mishal
5/10/06	Pathways	Roundtable	Mishal
5/11/06	Pathways	Advanced Appeals	Mishal
5/24/06	DCH Aging Conference	Psychiatric Advance Directives	Baker
6/25/06	Oakland CMH	Special Topic Roundtable	Mishal
7/27/06	DCH Consumer Conference	Chapter 7A and the Medicaid Dispute Resolution Processes	Baker
8/24/06	Barry, VanBuren, Pines CMH	RRAC/Appeals Committee training	Baker
9/5/06	Great Lakes Rural Mental Health Assoc.	Executive Director/Board Member Training	Mishal
9/8/06	Northern Lakes CMH	Special Topics Roundtable	Mishal
9/21/06	Oakland CMH	Issues Development	O'Dowd



## **DCH-ORR Training Unit Goals and Objectives for FY 2006 - 2007**

**Goal I:** Through education, develop a uniformly high standard of rights protection across the state.

Objective A. Assure that a standardized training program on the operation of a recipient rights office is developed and made available to community (CMHSP) and hospital (LPH/U) rights staff.

1. Establish training dates for FY 2006-2007 so that availability enables potential attendees to meet the standards of the MHC and master contract
2. Schedule Training programs at appropriate locations
3. Review "Basic Skills" Curriculum
4. Review curriculum for "Art of Investigation" training
5. Review "Developing an Effective Rights Training" curriculum
6. Review curriculum for "Issues" training
7. Revise course materials and print manuals, as necessary
8. Implement Training Programs

Objective B. Develop additional training programs to meet the needs of those involved in community rights protection

1. Develop and present at least three programs on the rights system for CMH/Hospital Directors

Objective C. Maintain master database of training workshops provided and those attending

1. Maintain master database

**Goal II:** Enhance consumer knowledge about their rights related to mental health services

Objective A. Develop processes for provision of rights education to consumers and family members at DCH hospitals and centers

1. Develop training modules using Internet and computer-based modalities

**Goal III:** Provide an annual educational conference for rights staff, consumers, and other professionals in rights-related fields

Objective A. Oversee the development and implementation of the 2007 Recipient Rights Conference

1. Coordinate monthly steering committee meetings
2. Select theme
3. Select speakers
4. Coordinate site logistics
5. Finalize arrangements with speakers
6. Finalize AV arrangement
7. Review conference evaluations and prepare written summary

**Goal IV:**     Provide rights education, as required by the MHC, DCH Central Office staff

Objective A.   Develop processes for orientation of new Central Office DCH employees to the recipient rights system and the requirements of the Mental Health Code

1.     Revise training curriculum to accommodate web-based learning principles
2.     Work with Human Resources (HR) and Michigan Public Health Institute (MPHI) to implement web-based recipient rights training for all DCH staff

**Goal V:**     Provide rights education and information to staff at DCH operated Hospitals and Centers

Objective A.   Provide technical and development assistance to ORR staff as they conduct mandatory rights education for staff at DCH hospitals and centers

1.     Conduct face-to-face new hire training programs as required
2.     Training Division provides technical assistance as required

**Goal VI:**     Miscellaneous

Objective A.   Collect and compile data for the annual report

1.     Receive monthly reports of training provided by DCH-ORR staff to consumers, DCH staff
2.     Receive monthly reports of training received by DCH-ORR staff
3.     Receive monthly reports of new hire training received by DCH staff
4.     Compile training data received for incorporation into annual report

## **PART III - COMMUNITY RIGHTS UNIT**

### **CMHSP Rights Systems Assessments**

Chapter 7 of the Mental Health Code requires the establishment of an office of recipient rights in each Community Mental Health Services Program (CMHSP).

The Mental Health Code requires that the Department of Community Health promulgate rules to establish standards for certification and the certification review process for CMHSPs. Administrative Rule 330.2801 requires the department to assess the CMHSPs' compliance with certification standards by determining the degree to which all of the following provisions apply:

- a) The CMHSP has established processes, policies and procedures necessary to achieve the required result.
- b) The established processes, policies and procedures are properly implemented.
- c) The expected result of the processes, policies and procedures is being achieved.

The Mental Health Code also requires that DCH, through this Office, review the CMHSP rights systems in order to "ensure a uniformly high standard of recipient rights protection throughout the state."

The certification standards must include those for the protection and promotion of recipient rights (MCL 330.232a [1][b]). Although standards as to matters of CMHSP governance, resource management, quality improvement, service delivery and safety management may be waived by the department in whole or in part as the result of the CMHSP's accreditation by a nationally recognized accrediting body, this is not the case relative to standards established by the department in regard to the protection and promotion of recipient rights.

### **Assessment Process**

Each CMHSP recipient rights system is assessed annually by two ORR Community Rights Specialists through careful review of and follow-up on semi-annual and annual reports prepared by each CMHSP rights office and submitted by their executive director. Annually, the Rights Specialists also conduct an onsite assessment of approximately one-third of the CMHSPs. This three day, onsite review includes an entrance conference; interviews with the executive director, rights office staff, consumers, CMHSP staff and staff of contract providers, Recipient Rights Advisory and Appeals Committee members; compliance review of complaint case files, logs, Code-mandated reports and notices, appeals cases; review of contract language to ascertain clarity as to how rights will be protected during the contract period and training requirements; compliance review of all twenty-two rights-related policies required by the Code; site visits to a representational sample of CMHSP directly operated and contracted service; and an exit conference. Site visits are also made to the LPH/U under contract with the CMHSP. Areas of non-compliance with Code and Rules evidenced by the rights system at the LPH/U are cited in the CMHSP assessment report. Additionally, if a serious deficiency were found, this would also be reported to the Psychiatric Licensing Consultant with the Department of Community Health.

## **Assessments Results 2006**

Fifteen (15) CMHSP rights protection systems were evaluated through onsite assessments conducted by the Office of Recipient Rights Community Rights Unit Specialists from March 2006 through December 2006. Beginning in March of 2001, a rights system was scored as being in less than substantial compliance, even if the overall score was in the range of substantial compliance, if the Specialists determined that a deficiency which was previously cited in the last assessment had not been corrected at the time of the current assessment. CMHSPs that were scored in this manner have an \* in the table which follows. Evidence that the repeat citation has been corrected must be provided to DCH-ORR within 30 days of receipt by the CMHSP of the assessment report.

***Full Compliance (FC) = 292 points***

***Substantial Compliance (SC) = 277 to 291 points***

***Less than Substantial Compliance (LSC) = Less than 277 points***

### **2006 Rights System Assessment Results**

<b>Date</b>	<b>CMHSP</b>	<b>Score</b>	<b>Result</b>
3/21 - 3/23	Woodlands Behavioral Healthcare Network	290	SC
4/11 - 4/13	Monroe County CMH Authority	291	SC
4/25 - 4/27	West Michigan CMH System	285	SC
5/16 - 5/18	Allegan County CMH Services	290	SC
6/12 - 6/13	Gogebic County CMH Authority	286	SC
6/14 - 6/16	Northpointe Behavioral Healthcare	290	SC
6/27 - 6/29	Huron Behavioral Health	285	SC
7/11 - 7/13	St. Clair County CMH	283	LSC*
7/24 - 7/28	Oakland County CMH Authority	285	SC
8/15 - 8/17	Montcalm Center for Behavioral Health	292	FC
8/29 - 8/31	Washtenaw Community Health Organization	292	FC
9/12 - 9/14	Northeast Michigan CMH Services	288	SC
9/25 - 9/29	Detroit-Wayne County CMH (Focus Visit)	285	SC <sup>1</sup>
10/24 - 10/26	Newaygo County CMH	292	FC
11/ 14 - 11/16	Macomb County CMH	273	LSC*
11/28 - 11/30	Gratiot County CMH	289	SC
12/12 - 12/14	Kalamazoo County CMH	292	FC

<sup>1</sup>As the rights system for Detroit-Wayne County CMH Agency was found to be in less than substantial compliance in 2005, a focus visit was conducted in 2006 to determine if the plan of correction submitted by the Agency had brought the Agency into, and maintained the system in, substantial compliance with the standards.

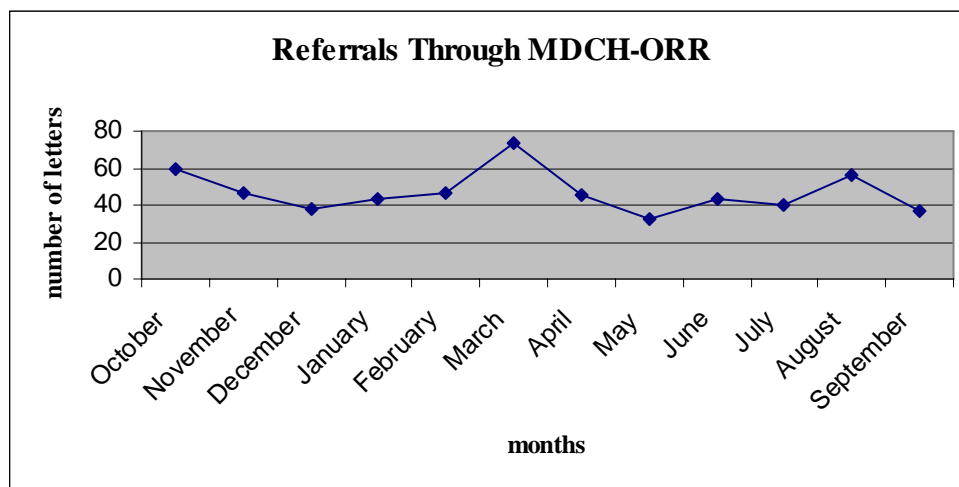
# INFORMATION AND REFERRAL

## Referral of Complaints

The Rights Information Analyst is responsible for providing all information and referral services including systematic data collection, entry and analysis relative to these services as well as the semi-annual and annual reports received from the CMHSPs and licensed private psychiatric hospitals.

Complaints received at the Department Office in Lansing are referred to the rights office having jurisdiction over the matter. Data was collected regarding the number of letters received by the office during FY 2005/2006. There were 561 written complaints referred through the Lansing Office of Recipient Rights. Of these, 103 were referred to the rights offices at state facilities/hospitals, 21 were referred to the local corrections rights offices or to the rights office at Bureau of Forensic Mental Health Services, 277 were sent to CMHSP rights offices, 129 were referred to the rights offices at licensed psychiatric hospitals/units, and 17 were referred to other agencies, such as DHS, MPAS, Inc, etc. Of the remaining complaints, eight were returned for lack of information and six could neither be returned to the complainant nor referred.

letters	
October	59
November	47
December	38
January	43
February	47
March	73
April	45
May	33
June	43
July	40
August	56
September	37



The Rights Information Analyst also acts as support to the Training Unit, Community Rights Specialists and the ORR Director of Community and Field Operations. The Information Analyst maintains the Rights Advisors/Officers Directory, available via e-mail and the DCH website. DCH-ORR also maintains a mass e-mail directory, which includes all CMHSP rights offices and all LPH/U rights advisors. At this time only two hospital rights advisors utilize personal addresses, (of 62 rights offices) as these hospitals have failed to provide e-mail and four hospitals have failed to provide Internet access to the information necessary to effectively operate rights offices.

## **DCH - ORR Community Rights Unit Goals and Objectives for FY 2006 - 2007**

**Goal I:**      Assure a uniformly high standard in the protection of rights of recipients

Objective A:   Establish minimum standards for site monitoring

1.      Establish a workgroup of stakeholders to draft the minimum standards
2.      Finalize standards following stakeholder review
3.      Disseminate to rights offices at DCH, CMHSPs and LPH/Us

Objective B:   Enhance usefulness of the DCH-ORR Annual Report on the status of rights protection in Michigan

1.      Establish Annual Report Data Workgroup
2.      Identify additional data sets needed to:
  - a.      Determine patterns and trends
  - b.      Determine performance indicators for rights protection systems

Objective C:   In conjunction with the DCH Bureau of Health Systems, pilot a rights system assessment at licensed hospitals

1.      Submit a concept paper for the assessment process for approval by DCH Director and Deputy Director of Health Policy, Regulation and Professions Administration
2.      Send letter to licensed hospital directors inviting participation
3.      Conduct rights system assessment

**Goal II:**      Promote the rights of recipients through education and training of providers and interested others

Objective A:   Provide training to CMHSP Executive Directors on how to assure a quality rights protection system

Objective B:   Conduct special topic training

## **PART IV - RECOMMENDATIONS to the DEPARTMENT**

1. The Department of Community Health must extend itself beyond the minimum requirement of Sec.754 of the Mental Health Code that it “endeavor to ensure” that the Office of Recipient Rights “has sufficient staff and other resources necessary to perform its functions.” Although applicable to all three ORR units, this is especially critical in the Field Unit, which provides direct rights protection services to patients and residents in state hospitals and centers. Rights advisory staff there must be sufficient in number to assure that they can not only respond reactively to allegations of rights violations through investigation and intervention, but can engage in proactive activities such as consumer training and education, staff training and education, consultation and monitoring for the purpose of promoting recipient rights and reducing the number of violations.
2. The Department of Community Health must establish clear statutory and contractual sanctions to be taken against a CMHSP for its failure to achieve substantial compliance with standards established by the department for the protection and promotion of recipient rights.
3. The Department of Community Health Human Resources Unit must coordinate with ORR in implementing the web-based recipient rights training for all new DCH employees within 30 days of hire.
4. The Department of Community Health should support and encourage the introduction of amendments to the Michigan Mental Health Code proposed by DCH-ORR in 2006, many of which incorporate recommendations made by the Michigan Mental Health Commission in its October 2004 Final Report to Governor Jennifer M. Granholm.
5. The Department of Community Health should afford DCH-ORR representation on any collective bargaining agreement negotiation team, or in lieu of that, afford the Office the opportunity to provide input on collective bargaining agreement language to assure that rights of patients and residents in state hospitals and centers are protected and appropriate corrective action is taken in cases of substantiated rights violations.
6. The Department of Community Health must support the statutory authority of this Office to establish compliance standards, practice standards, outcome expectations and uniform performance measures necessary to assure a uniformly high standard of rights protection in this state.

# PART V - STRATEGIC PLAN 2007 - 2008

Strategic Objective I	To assure a uniformly high standard in the protection of the rights of recipients.	Assignment	Timeframe	Jan-Mar 07	Apr-Jun 07	Jul-Sept 07	Oct-Dec 07
<b>Tactics</b>	<b>Action Plan</b>	<b>Assignment</b>	<b>Progress</b>				
A. Implement Code Changes by Jan 08	Shepard	Sanford/Baker	753 to Governor's office	2/7/07			12/30/08
			Barrie/Christie approval - to be placed on DCH Legislative Agenda	1/7/07			
			Recommendation included in annual report		5/20/07		
			initiate Pilot with 4 LPH/U		7/30/07		
B. Implement Administrative Rules Changes	Shepard	Sanford/Baker	In review by LSB	1/31/07			
			public hearing		6/18/07		12/30/08
C. Establish Minimum Standards in these areas:	1. Establish workgroup of stakeholders to draft minimum standards	Baker/ O'Dowl/ Mishal/Silver			4/1/07		
			Workgroup meetings x 2		4/25, 5/2/07		
Site Monitoring	2. Finalize and distribute	Baker/O'Dowl/ Mishal/Silver					
D. Provide Interpretive Guidance	Email response to a question then add to a web page for ORR FAQ's	Web page - Bogart		3/1/07			
		E-mail - Sobolewski	FAQ to team		5/2/07		
		Writing - all	Post to Web		5/7/07		
E. Contractual Inclusions	1. Sanctions for non-compliance with standards FY 08 contract	Baker	Language to Sanford	2/15/07			
		Sanford	Language to Kielhorn	3/15/07			
	2. Fix contract language in regard to training:						
	• Change to say "successfully complete"						
	• basic skills						
	• Mandate Executive Director attend within 1 year of hire	Silver		2/15/07			
	• ROIRAs must attend update training every three years						
F. Establish uniform rights related policies and procedures/Administrative Directive across state hospitals/centers	1. Facilitate PCP Workgroup	Baker/Postema	Meetings with PCP Group				12/30/07
				1/9, 2/13/07	4/3, 5, 1/07		
			Draft of Policy & Procedures		5/10/07		
	2. Review and analyze AD 07-C-1752/ AD-00	Baker/Postema/Staton	Reviewed	2/13/07			
			Reformatted		5/17/07		
			Review revisions		??		
			CNSI has material				
3. CHAMPS							
• Design manual							
• Train							
• Implement		Postema/Wellman/ Bogart					12/30/07



Strategic Objective I Tactics	To assure a uniformly high standard in the protection of the rights of recipients.	Assignment	Progress	Jan-Mar 07	Apr-Jun 07	Jul-Sept 07	Oct-Dec 07
G. Annual Report	1. Establish Annual Report Data workgroup	Baker	Members identified & invitations accepted	3/1/07			
	2. Identify Performance Indicators and notify rights offices	Mishal/O'Dowd/Baker/Sobolewski	Meetings x 2		April, May		
	3. Submit ORR Unit Goals for inclusion in 05/06 Annual Report	Baker/ Postema/ Silver/Sobolewski	Goals submitted	2/28/07		7/31/07	
			Included in Report		5/20/07		
Strategic Objective II	To promote the rights of recipients through education and training of providers and inter			Jan-Mar 07	Apr-Jun 07	Jul-Sept 07	Oct-Dec 07
Tactics	Action Plan	Assignment	Progress				
A. DCH Central Office training	1. Develop curriculum	Silver	Curriculum sent to MPH	2/8/07			
	2. Implement web-based training curriculum	Sanford/Silver	Curriculum reviewed/approved		4/31/07		
B. Poster campaign for DCH hospitals/centers	Develop and distribute initial 6 posters	Postema/Tucker/Wellman	Posters completed & displayed @ Caro		4/1/07		
			Project placed on HOLD		4/20/07		
C. Executive Director Training	1. Develop curriculum	Silver/Baker/O'Dowd/Mishal/Sobolewski	Meeting to determine data needed & initial content discussion		2/17, 3/7/07		
	2. Develop presentation		Presentation finalized		5/1/05		
	3. Implement training	Silver			6/25/07		
	4. Develop web-based curriculum	Silver/Baker/O'Dowd/Mishal/Sobolewski	Meeting to determine data needed & initial content discussion				
	5. Implement web based Directors' training	Silver			9/30/07		
D. Annual update training for DCH hospital/center staff	1. Develop training curriculum for submission to Silver	Postema				9/30/07	
	2. Submit training curriculum to MPH	Silver				10/10/07	
E. Receipt and provision of arbitration related training	1. Research arbitration decisions to identify problems	Sanford			5/1/07		
	2. HR training	Sanford				9/30/07	
	3. ORR staff training by arbitrator	Sanford				12/30/07	
F. Conduct special topic training	1. Submit topics (limit 3) to Silver	All	Submitted: Evidence Analysis, BMC & Role of Rights Office, Technical Writing, Stress & the Rights Office	2/6/07			
			Initial Topic Determined: Evidence Analysis		5/22/07		
	2. Develop curricula	Silver			9/30/07		

Strategic Objective II		To promote the rights of recipients through education and training of providers and inter					
Tactics	Action Plan	Assignment	Progress	Jan-Mar 07	Apr-Jun 07	Jul-Sept 07	Oct-Dec 07
G. Conduct public education	1. Post CMH assessment information on website	Bogart	Assessments posted		5/1/07		
To empower recipients to fully exercise their rights.							
Strategic Objective III							
Tactics	Action Plan	Assignment	Progress	Jan-Mar 07	Apr-Jun 07	Jul-Sept 07	Oct-Dec 07
A. Monitor the PCP process in DCH hospitals/centers	RAs to follow a minimum of 3 consumers through PCP process through FY 07	Field Unit	Initiated		4/1/07 (start)		
			Review for progress			7/15/07	
B. Facilitate the use of Psychiatric Advance Directives (PAD) and alternative statement of preferences	1. Train consumers and interested others	Baker	Training conducted at CEI, OCCMH	2/21, 3/29/07			12/30/07
	2. Train the trainer	Baker					12/30/07
	3. Train peer support specialists	Baker					12/30/07
C. Implement voter registration campaign in DCH hospitals/centers	1. Develop Strategy	Sanford	Meeting with MPAS: identified 2 sources of funding; agreed to partnership with MPAS, SOS, ORR	2/7/07			
D. Facilitate implementation of the Recovery Model in DCH psychiatric hospitals	1. Attend recovery Council meetings	Sanford/Baker	Attended meeting		5/18/07		
	2. Contact Jasper & schedule hospital staff and patient training	Baker	E-mail - Directors contacted: affirmative response from KPH, WRPH, Caro, CFP				
			trainings scheduled	2/1/07			
			Caro	2/20/07			
	3. Conduct Recovery Training	Baker	WRPH	2/7/07			
			CFP		4/13/07		
			KPH		4/20/07		
					4/27/07		

## Appendix A

### 1. State Facility Individual Data - Center for Forensic Psychiatry

#### 1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	0	0	0	0
7222	Abuse Class II	22	22	0	2
7223	Abuse Class III	14	14	0	1
7224	Sexual Abuse	5	5	0	0

#### 2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	2	2	0	0
7227	Neglect Class III	5	5	0	2

#### 3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	1	0	1	0
7545	Retaliation/Harassment	2	2	0	0
7060	Notice/Explanation of Rights	4	0	4	0
7780	Complaint Investigation Process	2	0	2	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

#### 4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	1	0	1	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	7	0	7	0

#### 5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc.	12	1	11	1
7044	Religious Practice	3	0	3	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	1	0	1	0
7048	Marriage/Divorce	0	0	0	0

## 6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	0	0	0	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

## 7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	1	0	1	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	27	0	27	0
7264	Funds for postage, stationery, telephone usage	1	0	1	0
7265	Written and posted limitations, if established	5	0	5	0
7266	Uncensored Mail	2	0	2	0
7267	Access to entertainment materials, information, news	8	0	8	0

## 8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	2	0	2	0
7485	Withholding of Information (includes Recipient access to records)	9	0	9	0
7486	Correction of Record	1	0	1	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

## 9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	60	0	60	0
7082	Sanitary	10	0	10	0
7083	Humane	29	0	29	0
1708	Dignity & Respect	89	8	81	4
7085	Nutrition	47	0	47	0
7086	Least Restrictive Setting	5	0	5	0

## 10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	33	2	31	1
7400	Restraint	0	0	0	0
7420	Seclusion	1	0	1	0

### 11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	8	0	8	0
7302	Facility Account	21	0	21	0
7303	Easy Access to Money in Account	11	1	10	0
7304	Ability to Spend or Use as Desired	4	0	4	0
7305	Delivery of Money upon Release	6	0	6	0
7360	Labor & Compensation	0	0	0	0

### 12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	16	0	16	0
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	2	0	2	0
7284	Search/Seizure	1	0	1	0
7285	Exclusions	2	0	2	0
7286	Limitations	5	1	4	0
7287	Receipts to Recipient and to Designated Individual	3	0	3	0
7288	Waiver	0	0	0	0
7289	Protection	32	0	32	0

### 13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	340	3	337	1
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	2	0	2	0
7140	Notice of clinical status/progress	2	0	2	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	44	0	44	0
7190	Notice of medication side effects	2	0	2	0
7029	Information on Family Planning	0	0	0	0

### 14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	0	0	0	0
7122	Timely development	0	0	0	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	6	0	6	0

#### 15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	2	0	2	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

#### 16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	43	0	43	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	2	0	2	0

#### 17. No Right Involved

Code	Category	Received
0000	No Right Involved	145

#### 18. Outside Provider Jurisdiction

Code	Category	
0001	Outside Provider Jurisdiction	49

<b>Total Investigated/Intervened</b>	1159	66	899	12
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## Appendix A

### 2. State Facility Individual Data - Hawthorn

#### 1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	1	1	0	0
7222	Abuse Class II	14	14	0	2
7223	Abuse Class III	8	8	0	0
7224	Sexual Abuse	1	1	0	0

#### 2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	4	4	0	1
7227	Neglect Class III	5	5	0	3

#### 3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	0	0	0	0
7545	Retaliation/Harassment	0	0	0	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	0	0	0	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

#### 4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	2	0	2	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	1	0	1	0

#### 5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc.	1	0	1	0
7044	Religious Practice	0	0	0	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

## 6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	0	0	0	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

## 7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	2	0	2	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	1	0	1	0
7264	Funds for postage, stationery, telephone usage	0	0	0	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	0	0	0	0
7267	Access to entertainment materials, information, news	2	0	2	0

## 8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	0	0	0	0
7485	Withholding of Information (includes Recipient access to records)	0	0	0	0
7486	Correction of Record	0	0	0	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

## 9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	11	0	11	0
7082	Sanitary	1	0	1	0
7083	Humane	11	0	11	0
1708	Dignity & Respect	17	1	16	1
7085	Nutrition	6	0	6	0
7086	Least Restrictive Setting	3	0	3	0

## 10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	13	0	13	0
7400	Restraint	0	0	0	0
7420	Seclusion	0	0	0	0



### 11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	0	0	0	0
7302	Facility Account	0	0	0	0
7303	Easy Access to Money in Account	0	0	0	0
7304	Ability to Spend or Use as Desired	0	0	0	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	0	0	0	0

### 12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	0	0	0	0
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	0	0	0	0
7285	Exclusions	0	0	0	0
7286	Limitations	0	0	0	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	2	0	2	0

### 13. Suitable Services

Code	Category	Received	Investigation	Intervention	0
7080	Treatment suited to condition	13	0	13	0
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	0	0	0	0
7140	Notice of clinical status/progress	0	0	0	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	1	0	1	0
7190	Notice of medication side effects	0	0	0	0
7029	Information on Family Planning	0	0	0	0

### 14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	0	0	0	0
7122	Timely development	0	0	0	0
7123	Requests for Review	2	0	2	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

#### 15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	1	0	1	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

#### 16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	0	0	0	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	0	0	0	0

#### 17. No Right Involved

Code	Category	Received
0000	No Right Involved	0

#### 18. Outside Provider Jurisdiction

Code	Category	
0001	Outside Provider Jurisdiction	0

<b>Total Interviewed/Intervened</b>	123	34	89	7
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## Appendix A

### 3. State Facility Individual Data - Kalamazoo

#### 1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	3	3	0	1
7222	Abuse Class II	33	33	0	10
7223	Abuse Class III	10	10	0	5
7224	Sexual Abuse	9	9	0	0

#### 2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	3	3	0	1
7226	Neglect Class II	2	2	0	0
7227	Neglect Class III	5	5	0	2

#### 3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	0	0	0	0
7545	Retaliation/Harassment	0	0	0	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	0	0	0	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

#### 4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	2	0	2	0

#### 5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc.	0	0	0	0
7044	Religious Practice	2	0	2	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

## 6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	0	0	0	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

## 7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	1	0	1	0
7262	Contact with Attorneys or others regarding legal matters	1	0	1	0
7263	Access to telephone, mail	9	0	9	0
7264	Funds for postage, stationery, telephone usage	2	0	2	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	2	1	1	0
7267	Access to entertainment materials, information, news	2	0	2	0

## 8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	3	0	3	0
7485	Withholding of Information (includes Recipient access to records)	4	0	4	0
7486	Correction of Record	0	0	0	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

## 9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	36	0	36	0
7082	Sanitary	4	0	4	0
7083	Humane	21	0	21	0
1708	Dignity & Respect	114	0	114	0
7085	Nutrition	11	0	11	0
7086	Least Restrictive Setting	2	0	2	0

## 10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	27	0	27	0
7400	Restraint	3	0	3	0
7420	Seclusion	3	1	2	1

### 11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	0	0	0	0
7302	Facility Account	0	0	0	0
7303	Easy Access to Money in Account	2	0	2	0
7304	Ability to Spend or Use as Desired	0	0	0	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	0	0	0	0

### 12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	7	0	7	0
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	3	0	3	0
7285	Exclusions	0	0	0	0
7286	Limitations	0	0	0	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	23	2	21	2

### 13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	79	0	79	0
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	0	0	0	0
7140	Notice of clinical status/progress	1	0	1	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	5	1	4	0
7190	Notice of medication side effects	0	0	0	0
7029	Information on Family Planning	0	0	0	0

### 14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	0	0	0	0
7122	Timely development	0	0	0	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

#### 15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	1	0	1	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

#### 16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	0	0	0	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	0	0	0	0

#### 17. No Right Involved

Code	Category	Received
0000	No Right Involved	28

#### 18. Outside Provider Jurisdiction

Code	Category	
0001	Outside Provider Jurisdiction	13

<b>Total Interviewed/Intervened</b>	476	70	365	22
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## Appendix A

### 4. State Facility Individual Data - Mount Pleasant

#### 1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	2	2	0	1
7222	Abuse Class II	111	111	0	9
7223	Abuse Class III	35	35	0	4
7224	Sexual Abuse	5	5	0	0

#### 2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	8	8	0	4
7227	Neglect Class III	20	20	0	14

#### 3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	3	0	3	0
7545	Retaliation/Harassment	1	1	0	1
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	0	0	0	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	7	5	2	4

#### 4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	5	0	5	0

#### 5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc.	1	0	1	0
7044	Religious Practice	1	0	1	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

## 6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	0	0	0	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

## 7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	2	0	2	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	12	0	12	0
7264	Funds for postage, stationery, telephone usage	0	0	0	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	0	0	0	0
7267	Access to entertainment materials, information, news	7	0	7	0

## 8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	2	1	1	1
7485	Withholding of Information (includes Recipient access to records)	2	1	1	0
7486	Correction of Record	0	0	0	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

## 9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	123	0	123	0
7082	Sanitary	2	0	2	0
7083	Humane	141	0	141	0
1708	Dignity & Respect	54	2	52	2
7085	Nutrition	10	0	10	0
7086	Least Restrictive Setting	1	0	1	0

## 10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	6	0	6	0
7400	Restraint	3	0	3	0
7420	Seclusion	0	0	0	0



### 11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	0	0	0	0
7302	Facility Account	1	0	1	0
7303	Easy Access to Money in Account	1	0	1	0
7304	Ability to Spend or Use as Desired	4	0	4	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	1	0	1	0

### 12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	23	0	23	0
7282	Storage Space	1	0	1	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	2	1	1	1
7285	Exclusions	0	0	0	0
7286	Limitations	0	0	0	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	17	0	17	0

### 13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	129	9	120	1
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	0	0	0	0
7140	Notice of clinical status/progress	1	0	1	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	2	0	2	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	1	1	0	1
7180	Psychotropic Drugs	1	0	1	0
7190	Notice of medication side effects	0	0	0	0
7029	Information on Family Planning	0	0	0	0

### 14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	1	0	1	0
7122	Timely development	0	0	0	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

### 15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	1	1	0	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

### 16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	0	0	0	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	0	0	0	0

### 17. No Right Involved

Code	Category	Received
0000	No Right Involved	36

### 18. Outside Provider Jurisdiction

Code	Category	5
0001	Outside Provider Jurisdiction	

<b>Total Interviewed/Intervened</b>	791	203	547	43
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## Appendix A

### 5. State Facility Individual Data - Caro Center

#### 1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	0	0	0	0
7222	Abuse Class II	43	43	0	0
7223	Abuse Class III	31	31	0	0
7224	Sexual Abuse	5	5	0	1

#### 2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	2	2	0	1
7227	Neglect Class III	1	1	0	1

#### 3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	0	0	0	0
7545	Retaliation/Harassment	0	0	0	0
7060	Notice/Explanation of Rights	2	0	2	0
7780	Complaint Investigation Process	0	0	0	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

#### 4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	1	0	1	0

#### 5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc.	1	0	1	0
7044	Religious Practice	3	0	3	0
7045	Voting	1	0	1	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

## 6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	2	0	2	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

## 7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	2	0	2	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	16	0	16	0
7264	Funds for postage, stationery, telephone usage	0	0	0	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	2	0	2	0
7267	Access to entertainment materials, information, news	13	0	13	0

## 8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	4	0	4	0
7485	Withholding of Information (includes Recipient access to records)	1	0	1	0
7486	Correction of Record	6	0	6	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

## 9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	60	1	59	1
7082	Sanitary	25	0	25	0
7083	Humane	52	0	52	0
1708	Dignity & Respect	56	3	53	1
7085	Nutrition	18	0	18	0
7086	Least Restrictive Setting	8	1	7	1

## 10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	25	1	24	1
7400	Restraint	0	0	0	0
7420	Seclusion	0	0	0	0

### 11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	3	0	3	0
7302	Facility Account	0	0	0	0
7303	Easy Access to Money in Account	1	0	1	0
7304	Ability to Spend or Use as Desired	1	0	1	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	0	0	0	0

### 12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	39	0	39	0
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	1	0	1	0
7284	Search/Seizure	1	0	1	0
7285	Exclusions	0	0	0	0
7286	Limitations	0	0	0	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	14	1	13	1

### 13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	94	0	94	0
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	4	0	4	0
7130	Choice of physician/mental health professional	3	0	3	0
7140	Notice of clinical status/progress	1	0	1	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	6	1	5	1
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	1	0	1	0
7180	Psychotropic Drugs	12	0	12	0
7190	Notice of medication side effects	2	0	2	0
7029	Information on Family Planning	0	0	0	0

### 14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	4	1	3	1
7122	Timely development	0	0	0	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

### 15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	1	0	1	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

### 16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	3	0	3	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	0	0	0	0

### 17. No Right Involved

Code	Category	Received
0000	No Right Involved	70

### 18. Outside Provider Jurisdiction

Code	Category	
0001	Outside Provider Jurisdiction	11

<b>Total Interviewed/Intervened</b>	652	91	480	10
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## Appendix A

### 6. State Facility Individual Data - Walter Reuther

#### 1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	0	0	0	0
7222	Abuse Class II	22	22	0	3
7223	Abuse Class III	15	15	0	0
7224	Sexual Abuse	2	2	0	0

#### 2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	1	1	0	1
7227	Neglect Class III	3	3	0	3

#### 3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	2	0	2	0
7545	Retaliation/Harassment	0	0	0	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	0	0	0	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

#### 4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	19	0	19	0

#### 5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc.	2	0	2	0
7044	Religious Practice	2	0	2	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

## 6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	2	0	2	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

## 7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	6	0	6	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	4	0	4	0
7264	Funds for postage, stationery, telephone usage	0	0	0	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	0	0	0	0
7267	Access to entertainment materials, information, news	1	0	1	0

## 8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	0	0	0	0
7485	Withholding of Information (includes Recipient access to records)	1	0	1	0
7486	Correction of Record	0	0	0	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

## 9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	39	2	37	2
7082	Sanitary	7	0	7	0
7083	Humane	5	0	5	0
1708	Dignity & Respect	42	5	37	2
7085	Nutrition	4	0	4	0
7086	Least Restrictive Setting	0	0	0	0

## 10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	89	1	88	0
7400	Restraint	0	0	0	0
7420	Seclusion	0	0	0	0



### 11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	3	0	3	0
7302	Facility Account	9	0	9	0
7303	Easy Access to Money in Account	1	0	1	0
7304	Ability to Spend or Use as Desired	2	0	2	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	0	0	0	0

### 12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	10	0	10	0
7282	Storage Space	1	0	1	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	0	0	0	0
7285	Exclusions	0	0	0	0
7286	Limitations	0	0	0	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	25	0	25	0

### 13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	173	3	170	1
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	0	0	0	0
7140	Notice of clinical status/progress	0	0	0	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	17	0	17	0
7190	Notice of medication side effects	0	0	0	0
7029	Information on Family Planning	0	0	0	0

### 14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	0	0	0	0
7122	Timely development	0	0	0	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

#### 15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	0	0	0	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

#### 16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	0	0	0	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	0	0	0	0

#### 17. No Right Involved

Code	Category	Received
0000	No Right Involved	30

#### 18. Outside Provider Jurisdiction

Code	Category	Received
0001	Outside Provider Jurisdiction	2

<b>Total Interviewed/Intervened</b>	541	54	455	12
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